

RECEIVED

APR 22 1993

EX PARTE OR LATE FILED

FLEISCHMAN AND WALSH

ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1400 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20036

(202) 939-7900
FACSIMILE (202) 745-0916

AARON I. FLEISCHMAN

FLEISCHMAN AND WALSH, P. C.

CHARLES S. WALSH

ARTHUR H. HARDING

STUART F. FELDSTEIN

RICHARD RUBIN

JEFFRY L. HARDIN

STEPHEN A. BOUCHARD

R. BRUCE BECKNER

ROBERT J. KELLER

HOWARD S. SHAPIRO

SETH A. DAVIDSON

CHRISTOPHER G. WOOD

MATTHEW D. EMMER

JONATHAN R. SPENCER

DAVID D. BURNS

RUSSELL C. MERBETH

JILL KLEPPE McCLELLAND

MARK J. O'CONNOR

April 22, 1993

Donna R. Searcy, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: FCC Inquiry on Cable/Consumer
Electronics Equipment Compatibility
ET Docket No. 93-7

Dear Ms. Searcy:

Transmitted herewith, on behalf of Bang & Olufsen, is the original Bang & Olufsen letter response to the Comments submitted in the above-referenced proceeding on cable/consumer electronics compatibility. Ten copies of this letter were filed with the Commission yesterday. As noted in the accompanying cover letter, the original letter was in transit and would be submitted upon receipt. Please associate this original letter with the appropriate docket.

Should you have any questions concerning the foregoing, please contact the undersigned.

Very truly yours,

Howard S. Shapiro
Howard S. Shapiro

HSS/gt/6209

Enclosure

No. of Copies rec'd 0
List A B C D E

Bang & Olufsen

Bang & Olufsen
Western Regional Training
10122 Colima Ave.
San Ramon, CA 94583

Tel 510 551-8404

Fax 510 551-0131

Bang & Olufsen of America, Inc.
1150 Feehanville Drive
Mount Prospect, Illinois 60056

Phone: (708) 299-9380
Fax: (708) 699-1475

RECEIVED

APR 22 1993

To: Members of Federal Communications Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

From: Pete Block
Bang & Olufsen, Western Regional Trainer

Date: April 20, 1993

Subject: FCC response on compatibility

In response to your hearings on compatibility re the ANSI/EIA 563 standard I would like to make some comments.

In 1989 Bang & Olufsen of America began marketing a very high end television and video tape recorder. From the beginning of production, we have incorporated the 21-pin connector to make our television compatible with "multiport" decoders. Not only do we use the 21-pin Scart plug to connect to multiport but we also use it to interconnect our TV and VCR. While the number of sets we sell is not large in relation to the numbers sold by many other manufacturers, we feel we have spared nothing so as to give our customers the very best that video can offer. Since the introduction of the set (we manufacture only one model of TV and one VCR: the MX5500 and VX5000, respectively) we have sold nearly 6,000 televisions and more than 4,100 VCRs.

While it is probably true that the Scart connection is too expensive for use on "entry level" TVs, I feel it is eminently appropriate for use on a television that is being produced with the primary dictate of providing the customer with the best possible video quality. Under this scenario, the ANSI/EIA 563 connection is not only acceptable, it is very effective and dependable.

When we were doing the initial design for our TV, one of our primary goals was to produce a television that could apply, to the best advantage, what cable television had to offer at that time. In

noise or another television channel leaking in on the cable frequency from the outside due to a poorly designed tuner section. To this end we designed a television "front end" with an 80 dB rejection specification. To take this type of tuner and put the typical cable "down convert to channel 3" decoder box in front of it would be counter-productive, to say the least. The ANSI/EIA 563 "multi-port" solution has worked very well for us.

Not only do we install this connector on our TV, we also install one on our VCR. This allows our customers to legally video tape one scrambled program while watching another.

I believe that starting over with a new design at this point would be useless, duplicating work already performed. We already have a system that works – and I might add it works very well. To abandon it and start over would be foolish! I would also like to add that we use this same connector in Europe. (While I don't have the sales figures for that market you may rest assured that, as a Danish company, it is many times our U.S. sales.)

Note, too, that the 21-pin connector is also used on our system to connect the VCR and the TV. Since a single computer in our TV controls the entire system – managing the logic between the TV and VCR – we require a very tough and dependable connection. We also use that connector to send S-video, composite video, stereo audio and data between the two pieces of the system. We can maintain dependable connection and picture quality up to 32 feet with this system. We tried others when designing the system and could not find a better connector.

I know that the multiport system hasn't gained great acceptance but I know from first-hand experience that it works very well. Since I moved to northern California about one year ago, I have personally been using this type of decoder and am very pleased with the results. It is a joy to not have to constantly switch from a cable "converter" and my TV's tuner system.

Thank you very much for allowing me to comment on this subject. I hope my input will be of use in convincing you not to fix something that is already working very well indeed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Pete Block". The signature is fluid and cursive, with the first name "Pete" and last name "Block" clearly distinguishable.

Pete Block

Western Regional Trainer/Product Specialist